



UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

EIGHT MILE STYLE, LLC; MARTIN
AFFILIATED, LLC,

Plaintiffs,

v.

SPOTIFY USA INC.,

Defendant.

Civil Case No. 19-CV-00736

Hon. Aleta A. Trauger

SPOTIFY USA INC.'S MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Pursuant to Section 5.07 of the Amended Practices and Procedures for Electronic Case Filing (Administrative Order 167-1), Spotify USA Inc. respectfully moves for leave to file under seal select portions of the Declaration of Anna Lundström (“Declaration”) in support of Spotify’s Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue, or, in the Alternative, to Transfer Venue to the Southern District of New York. Spotify’s counsel conferred with Plaintiffs’ counsel on October 28, 2019, and Plaintiffs do not oppose this request.

To “justify nondisclosure to the public,” “[t]he proponent of sealing must provide compelling reasons to seal the documents and demonstrate that the sealing is narrowly tailored to those reasons—specifically, by ‘analyz[ing] in detail, document by document, the propriety of secrecy, providing reasons and legal citations.’” *Beauchamp v. Federal Home Loan Mortgage Co.*, 658 F. App’x 202, 207 (6th Cir. 2016) (quoting *Shane Grp, Inc. v. Blue Cross Blue Shield of Michigan*, 825 F.3d 299, 305-306 (6th Cir. 2016)). Consistent with these requirements, Spotify redacted three paragraphs of the Declaration because it concerns a confidential agreement (the “Agreement”) between Spotify and a third party. The Agreement contains commercially sensitive